

I. Rejection of claims 1-20 under 35 U.S.C. § 103

Claims 1-20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Reynolds et al. (U.S. Patent No. 6,411,993) in view of Friedman et al. (U.S. Patent Application Publication No. 2003/0208556).¹

The Examiner asserts that Reynolds does not disclose a plurality of function modules that execute functions pertaining to the creation or manipulation of a compilation of content, and now relies on Friedman for that feature. However, Applicant respectfully submits that Friedman does not disclose a plurality of function modules as claimed. The Examiner asserts that module 266 of Friedman can be implemented as an application using different programming techniques. Assuming module 266 teaches the claimed function module, Friedman does not disclose *a plurality* of functions modules, each module for executing a function pertaining to the creation or manipulation of a compilations of content.

The Examiner further states that page 4, paragraph 0054 of Friedman teaches that one or more applications can be implemented under control of the system. As indicated in para. 0054,

¹ In response to Applicant's argument that Reynolds does not disclose a plurality of function modules, the Examiner asserts that Friedman, and not Reynolds was cited for teaching the plurality of function modules. However, Applicant refers to para. 2 of the current Office Action on pages 2 to 3 where the Examiner referring to Reynolds states “The functional layer comprising a plurality of function modules, each function pertaining to the created or manipulation of a compilation of content.’ The Ibook server application 64 handles different functions such as directs the overall operation....therefore, the server must include plurality of modules to handle these functions.” Therefore, Applicant submits that Reynolds and not Friedman was cited for teaching the plurality of function modules.

However, as previously submitted, there is no teaching or suggestion that the application server 64 of Reynolds includes a plurality of function modules that execute functions pertaining to the creation or manipulation of a compilation of content selected by a user from the databases 66, 68, 70, 72, 74 and 76.

one or more applications necessary for web server 260 to perform its appropriate functions are executed under the control of an operating system. The server 260 controls the flow of information to and from a database server 270. Further, web server 260 retains in memory one or more “pages” which collectively may comprise a web site used to visually present the information on the pages. See paras. 0054 and 0055. However, there is no indication that web server 260 comprises a plurality of function modules which execute functions pertaining to the creation or manipulation of a compilation of content selected from the plurality of content entities by the user. Moreover, there is no indication that web server 260 comprises a plurality of function modules that receive requests from a user via the user interface and returns information concerning the compilation of content.

Therefore, assuming arguendo that a person of ordinary skill in the art would have been motivated to combine the teachings of Reynolds and Friedman, it is respectfully submitted that the combination would fail to include the “plurality of function modules” as recited in claim 1.

For at least the above reasons, claim 1 and its dependent claims should be deemed patentable. Since claims 6 and 11 recite similar subject matter, claims 6 and 11 and their dependent claims should be deemed patentable for the same reasons.

II. Conclusion

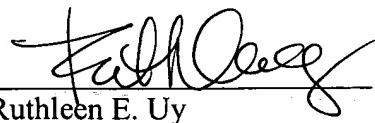
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

RESPONSE UNDER 37 C.F.R. § 1.116
Appln. No.: 09/489,605

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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